



December 10, 2019

VIA ELECTRONIC MAIL

Brian Himmel (bhimmel@reedsmith.com)

Jeffrey Melton (jmelton@reedsmith.com)

Re: *IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION* MDL No. 2804
PEC's Challenges to AmerisourceBergen's Privilege Claims

Dear Counselors:

This letter shall serve as the PEC's next round of sample challenges to ABDC's privilege claims. Attached to this correspondence is a spreadsheet which sets-forth our current sample challenges. As you will see, the attached spreadsheet incorporates the privilege claim information from ABDC's privilege logs, and provides some sample bases for Plaintiffs' challenges - as articulated in the far-right column on the spreadsheet.

Pursuant to the 10/29/2019 order governing privilege (Doc. 2882), please advise of your availability to meet and confer regarding these challenges. We will make ourselves available for the meet and confer on Thursday (12/12) from 8 am to noon EST or after 4:30 pm EST, as well as any time on Monday (12/16) or Tuesday (12/17). Also, we can make ourselves on other days if needed. We look forward to hearing from you. Thank you.

Sincerely,

/s/ Anthony Irpino

Anthony D. Irpino

ADI/bz

Attachment

cc: (via e-mail)
Joseph Mahady
Shannon McClure
Robert Nicholas
Mark Pifko
Sterling Cluff
Scott Simmer
Pearl Robertson